MONTANA UNDERGROUND STORAGE TANK PROGRAM NEWSLETTER

MUST News

Department of Environmental Quality

Summer Issue 2006

Interested in Becoming a Compliance Inspector?

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The Department of Environmental Quality will offer a compliance inspector training class October 17 through October 20 in Helena. The first two days are classroom instruction and written testing. Those who pass the compliance inspector written test will be assigned a field testing day either Thursday or Friday. The class and written test will be held in Room 111 (second floor) at the department's Metcalf Building, 1520 East Sixth Ave., Helena.

To register please contact Janie Petaja at (406) 444-4656 or E-mail: jpetaja@mt.gov. Study guides are available upon request at a cost of $210. Please submit the registration form 20 days prior to the course date. All day courses will have a one hour, no-host lunch break.

The schedule below lists class times and locations.

Compliance Inspector Trainer Course	**Date**	**Time**	**Location**
Compliance Inspector Class Day 1	Tuesday October 17, 2006	8 a.m. – 5 p.m.	DEQ Room 111
Compliance Inspector Class Day 2 – Written Test Administered	Wednesday October 18, 2006	8 a.m. – 5 p.m.	DEQ Room 111
Field Testing – Applicant is assigned 1 day only, either Thursday or Friday	October 19-20, 2006	8 a.m. – 5 p.m.	Field

Montana Department of Environmental Quality

Underground Storage Tank Section
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What Do We Know About Ethanol And Alkylates As Pollutants?

D. W. Rice, A.A. Marchetti, T. Buscheck, S. W. Layton, 2001

Approved for public release; further dissemination unlimited. This work was performed under the auspices of the United States Department of Energy by the University of California, Lawrence Livermore National Laboratory under contract No. W-7405-Eng-48.

Ethanol used for fuels is made primarily from grains, but any feed stock containing sugar, starch, or cellulose can be fermented to ethanol. Ethanol contains 34.7 percent oxygen by weight. It is less dense than water, but infinitely soluble in water. Ethanol vapors are denser than air. One and a half gallons of ethanol have the same energy as one gallon of gasoline. Pure fuel ethanol, and gasoline with ethanol, conducts electricity, while gasoline without ethanol is an insulator. Corrosion and compatibility of materials is an issue with the storage of pure ethanol and gasoline with high percentages of ethanol, but these issues are less important if gasoline with less than 10 percent ethanol is used.

Methods

To evaluate potential ground and surface water impacts associated with the increased use of ethanol and alkylates in transportation fuels, the following steps were taken by a team of investigators at LLNL, University of Iowa, Clarkson University, and University of California, Davis:

- Began the development of a comprehensive life-cycle evaluation;
- Performed literature reviews of environmental properties and transport and fate of ethanol, fuel alkylates, and benzene in the presence of ethanol;
- Used screening models to evaluate ground and surface water impacts;
- Evaluated chemical analysis techniques used to measure ethanol and alkylates in the environment;
- Submitted research findings to peer review.

As part of the overall assessment of ethanol as a fuel oxygenate, OEHHA has developed a draft Health Protective Concentration for ethanol in drinking water of 1100 mg/L. By comparison, the public health goal for MTBE is dramatically lower at 0.013 mg/L.

Impact of Gasoline Containing Ethanol on Surface and Ground Waters

As part of LLNL's effort, release scenarios were developed based on the production, distribution, and use of ethanol as a fuel oxygenate. To date, the following scenarios were evaluated because they were most likely to have impact: leaking underground fuel tank releases; rail tank car release to a river; and bulk ethanol release at a fuel distribution terminal. Not all release scenarios were evaluated and a complete life cycle analysis needs to be performed.

Impact of Leaking Underground Fuel Tank Releases

Ethanol is degraded very rapidly in soils and water. Ethanol will most likely be preferentially utilized over all the BTEX compounds under aerobic and anaerobic conditions. The preferential degradation of ethanol in groundwater may result in longer dissolved benzene plume lengths. Ethanol constitutes a significant demand on oxygen (and other electron acceptors) and is likely to cause the depletion of electron acceptors for BTEX degradation. This is particularly important for benzene because it degrades slowly under anaerobic conditions (Corseuil, et al., 1997; Alvarez and Hunt, 1999). Ethanol concentrations exceeding 40,000 mg/L in microcosm experiments were toxic to the microorganisms, as shown by a complete lack of oxygen consumption (Hunt et al., 1997).

Three independent screening model assessments indicate that average benzene plumes may increase 24 to 33 percent in the presence of ethanol. In relatively rare cases, benzene plumes may increase as much as 100%. These models make two important simplifying and conservative assumptions: 1) benzene is not degraded in the zone where ethanol is being rapidly degraded, and 2) the biodegradation rate for benzene is uniform over the length of the benzene plume. If these assumptions are not representative of actual processes, then benzene plume lengths may be shorter than estimated by the screening models (McNab et al., 1999). The

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comparative potential impact of increased benzene plume lengths, relative to MTBE, were also evaluated. A baseline potential impact was developed for benzene without ethanol present. This baseline was used to compare the impacts of MTBE plumes and benzene plumes with ethanol present. Compared to the use of ethanol, the estimated potential future increase in public wells impacted by MTBE is significantly higher if MTBE were to remain the primary fuel oxygenate (Powers et al., 2001).

There have been concerns about ethanol increasing the groundwater solubility of fuel hydrocarbon components, such as benzene. The impact of ethanol co-solubility effects on benzene dissolution will likely be very minor when 10% gasohol is used. The impacts of increased dissolution and mobility may be significant when bulk pure fuel ethanol is released on to fuel hydrocarbons already present in the subsurface. The co-solubility effects on less soluble gasoline components, such as alkylates, has not been evaluated. Although gasoline containing 10% ethanol (gasohol) is widely used in Iowa and Nebraska, the ethanol concentrations associated with gasohol releases are typically not measured because ethanol is not a regulated pollutant. There is a perception that no important differences exist between gasoline with and without 10% ethanol, but potential differences have not been evaluated in the field. The lack of historical benzene and ethanol concentration data at gasohol leak sites is a major knowledge gap.

Impact of a Rail Car Release to Surface Waters

The impacts of ethanol-containing gasoline on surface water resources were also evaluated. The loss mechanisms for MTBE and ethanol from surface waters are different. Ethanol is removed through biodegradation, while MTBE is removed through volatilization at the water's surface. If there are spills of equal mass, MTBE will have much greater impact to surface water drinking supplies. Washout of ethanol from the atmosphere through rain may be 40 times greater than MTBE. Ethanol concentrations in rain could be about 40 to 65 ppb. Ethanol will be rapidly removed from rainwater through biodegradation.

Bulk Ethanol Release at a Fuel Distribution Terminal

In March 1999, a 19,000-gallon release of neat ethanol occurred from an above-ground storage tank at a Northwest fuel distribution terminal. Following the ethanol release, a groundwater sampling program was implemented to delineate the ethanol plume and understand the impact of ethanol on the existing non-aqueous phase liquid (NAPL) and dissolved hydrocarbon plumes (Buscheck et al., 2001).

With a sufficiently large amount of ethanol in a localized subsurface environment, gasoline and water become completely miscible with each other and merge into a single phase (Powers et al., 2001). Laboratory experiments demonstrate a logarithmic increase in BTEX with increasing ethanol concentrations (Heerman and Powers, 1998). Neat ethanol releases could result in an order of magnitude increase in BTEX concentrations (Powers et al., 2001) (da Silva et al., 2001) conducted microcosm experiments to study aerobic, denitrifying, iron-reducing, sulfate-reducing, and methanogenic conditions. Aquifer materials from the Northwest terminal were included in these experiments. Ethanol retarded toluene degradation under aerobic, sulfate-reducing, and iron-reducing conditions. Ethanol enhanced toluene degradation under denitrifying conditions.

Ethanol migrated approximately 250 feet between March and September 1999, consistent with groundwater velocity estimates, but was not detected at that distance after September 1999. Ethanol concentrations in two monitoring wells near the release have declined by a factor of 50 to 150 over two years. Ethanol appears to enhance the thickness of NAPL in two monitoring wells. Co-solvent effects of ethanol are suggested by benzene concentrations increasing by a factor of 10 or more in one monitoring well. The presence of ethanol has created a strongly anaerobic groundwater system, demonstrated by low dissolved oxygen, depleted nitrate and sulfate, and high methane concentrations.

Increased Use of Alkylates in Gasoline

Alkylates are high-octane solutions of isoalkanes that are blending components of gasoline. Alkylates are branched

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hydrocarbons with octane ratings close to 100. With a phase out of MTBE, the alkylate composition of gasoline is expected to increase to maintain octane levels. Compared to MTBE, less ethanol is required to meet specified oxygen content in gasoline. Adding additional alkylates to gasoline that contains ethanol may compensate for this octane deficit.

Alkylates have low solubility in and are less dense than water. They are complex mixtures, and properties like biodegradability or toxicity are not easily extrapolated to all alkylate compounds. Cancer risk, reproductive and developmental effects have not been well studied.

Alkylates have high Henry's law constants. In air-water systems they concentrate mainly in the air phase. Air is the major sink for surface releases of alkylate with two to three days half-life due to hydroxy-radical oxidation. Alkylates are expected to have limited potential for rainout from the atmosphere. Alkylates have moderate ozone forming potential compared to other gasoline components. After a surface water spill, these compounds will rapidly volatilize from the surface film.

Primary subsurface transport will likely be in the vapor phase. During a subsurface release, depending on soil characteristics and source location, significant migration to the atmosphere is possible. There is also strong absorption of alkylates in the soil organic phase (high Kow). Any persistence of alkylates in groundwater would probably be more of a taste and odor issue.

With the increased use of alkylates in gasoline, minor increases in alkylates probably will occur in the subsurface at release or spill sites. Alkylate solubility in water is very low (10"- 10'' M). Persistence of isooctane and other branched alkanes in groundwater is poorly understood relative to BTEX compounds. Branched alkanes tend to be recalcitrant in the subsurface, but there have only been a few experimental biodegradation studies. A laboratory experiment conducted by Solano-Serena (1998) used an unpolluted forest soil to incubate a gasoline solution. After 28 days at 30°C, 20 percent of the isooctane was degraded. Benzene, in contrast, was completely degraded. The corresponding degradation half-life is about 88 days for isooctane. Based on the results of a field study of a contaminated aquifer by Nielsen (1996), it is likely that the in-situ degradation of isooctane will be considerably longer and will depend in part on the occurrence of certain natural microorganisms capable of degrading fuel hydrocarbons.

The behavior of alkylates in the subsurface is less understood for a gasohol spill. Ethanol as a co-solvent can increase the solubility of alkylates; e.g., calculations show that for an ethanol concentration in water of 10 percent [v] the solubility of isooctane would increase by -1.5.

Conclusions and Recommendations

The water resource impacts associated with the use of ethanol will likely be significantly less than those associated with the continued use of MTBE. The key factor is the biodegradability of ethanol compared to MTBE. If a decision is made to use ethanol as a fuel oxygenate, several additional analyses and experiments should be performed to help manage the use fuels containing ethanol (Rice et al., 1999).

- An expanded life cycle analysis of ethanol and alkylates is needed, including development of direct and indirect impacts of ethanol and alkylate production, distribution, and use.

- Field and laboratory studies should be performed to improve our understanding of:

  - the degradation of dissolved benzene by ethanol degrading microbial populations;
  - changes in benzene degradation rates over the length of a dissolved benzene plume;
  - vadose zone transport of gasoline components in the presence of ethanol; and
  - Henry's law constants for alkylates.

- Additional historical case data from 10% gasohol release sites should be collected and analyzed.

- Potential impacts associated with the increased use of alkylates in reformulated fuels needs to be evaluated further.

What Do We Know About Ethanol And Alkylates As Pollutants? - *continued from page 4*

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da Silva, M.L.B, G.M Ruiz, J.M. Fernandez, H.R. Beller, and P.J.J. Alvarez. 2001. Effect of Ethanol versus MTBE on BTEX Natural Attenuation. Sixth International Battelle Symposium on In Situ and On-Site Bioremediation. San Diego, CA, June 4-7,2001. ■

Found Tanks

Property owners who find previously unknown storage tanks should take the following steps:

- Contact the Montana Underground Storage Tank Section, (406) 444-5300;
- Notify the Montana Underground Storage Tank Program on a Notification Form. Additional information and forms are available on the web at http://www.deq.mt.gov/UST/NotificationRegist.asp;
- Submit a permit application to the UST Section within 90 days. Closure information and forms are available on the web at http://www.deq.mt.gov/UST/USTCLOSURE.asp;
- Have a licensed remover remove the tanks and take soil samples within six months of receiving a removal permit from the UST Section. A list of licensed removers is available on the web at: http://www.deq.mt.gov/UST/MonthlyReportsPDF/LicensedRemovers.pdf
- Contact the Petroleum Release Section at 1-800-457-0568 within 24 hours if contamination is discovered at the time of the tank removal or if the laboratory samples indicate a release has occurred. ■

Meet Petro Board Member Roger Noble

Roger Noble of Kalispell fills the board's statutorily required position for a representative of the consulting industry.

Roger is a native Montanan, born and raised in Lewistown. With the exception of a seven-year stint in Boise, he has lived in Montana his entire life. Roger has 25 years experience in water supply and groundwater contaminant investigations. After working for various private and governmental entities for the past 25 years he recently started his own consulting firm, Applied Water Consulting, LLC. The company has three employees and is growing.

Roger has been around the petroleum marketing business since childhood. His father, Charles Noble, was consignee of the Texaco bulk plant, which later became Spring Creek Oil. A DEQ representative once remarked that this was the cleanest bulk plant he had ever seen.

Roger earned an undergraduate degree in geology in 1978 from the University of Montana and a master's in geology in 1984 from Montana Tech. He holds professional geologist registration in Idaho and Oregon, and is a member of the National Ground Water Association.

"I had originally planned to be a petroleum geologist, but fortunately fate and fortuity steered my career into water resources and I have enjoyed the ride along the way," he said.

Roger's wife, Shawna, works as an ultrasound technician. The couple has two children, David Jr., a junior at Kalispell High School, and Melanie, an eighth grader at Kalispell Junior High. ■

Getting Solid Closure On Release Sites

All the necessary hard work to investigate and clean up petroleum releases reaches its desired end with the issuance of a "no further action" letter from the Montana Department of Environmental Quality's Petroleum Release Section (PRS). As described in the article "Leak Process" in the winter 2006 issue of MUST News:

> "Once an owner or operator has achieved all the release response and corrective action requirements outlined in Subchapter 6, a release will be evaluated for closure as outlined in ARM 17.56.607(4). Technical Guidance 9 – Petroleum Release Closure, which can be located on the Internet at http://deq.mt.gov/LUST/TechGuidDocs/techguidlist.asp outlines procedures used to evaluate releases for closure. Because criteria outlined in Technical Guidance 9 must be achieved before a release can be resolved, owners and operators should consult this document early in their release management process to ensure their activities, information, and documentations will be adequate to receive a 'no further action' letter from the department."

Owners and operators of petroleum storage tank sites and underground storage tank sites can facilitate release closure by reviewing Technical Guidance Document 9 early in the process to ensure that all the required work will be completed before the end of the process. This article describes some recurring issues that have required owners and operators to conduct additional work or collect missing data late in the cleanup process when it can often delay closure of the release.

These are some of the more common issues:

No worst-case area monitoring well

One of the goals necessary to close a release includes determining whether the release has impacted state waters,

Getting Solid Closure On Release Sites - *continued from page 6*

which includes all surface and groundwater in the state with few exceptions. This can only be determined by sampling groundwater at the location where it becomes contaminated, or the probable worst-case location. As stated in Technical Guidance Document 9, the DEQ considered this location to be placed directly down-gradient and less than ten feet from the source of the release.

Monitoring wells not located directly down-gradient

Petroleum contamination flows away from the source along with the groundwater flowing beneath the release site. The actual groundwater flow direction at a release site cannot be determined until after the first three monitoring wells are drilled and surveyed. So the first three wells are drilled using only estimates of the groundwater flow direction, and there have been many cases where none of the first set of monitoring wells are placed directly down-gradient from the source**.** It then becomes very important to place the next series of monitoring wells in locations where they can best capture a potential contamination plume flowing from the source. The DEQ has not been able to close some releases because the network of mentoring wells are not placed locations where they can best identify and map the full extent and magnitude of a potential groundwater contamination plume. Additional monitoring wells and a full year of monitoring may be required to fill in the missing data before the release can be closed. If additional wells identify previously unidentified contamination, then additional investigation or cleanup may also be required.

Entire tank system not assessed for contamination

Montana law requires "owners and operators to measure for the presence of a release where contamination is most likely to be present at a petroleum storage tank and underground storage tank site" (MCA 17.56.504(1)(b) and 15.56.602(1)(b)(v). This means that before the DEQ can close a release, the owner or operator must investigate and sample all areas where contamination is reasonably expected to be located. Such areas include all portions of the tank system where the release originated (e.g., tank, pipe, dispensers, etc.). This may also include other areas on the facility such as stained surface soil, other tanks, or petroleum storage and disposal areas. When owners and operations and their consultants inventory and properly investigate the facility during the initial response and abatement phase of their release investigation, they ensure that all necessary data is available for the DEQ to review the release for closure.

Seasonal groundwater fluctuations not assessed

Montana seasons directly influence the water table and groundwater flow characteristics. Not only does the water table rise and fall with the seasons, but groundwater flow directions can also shift, and, in extreme cases, actually reverse. Investigating releases throughout a full range of seasonal conditions is critical to fully understanding their extent, magnitude, and risks they pose. As a general rule of thumb, a monitoring well must be sampled during both seasonal high and low water table conditions. Shifting flow directions can also complicate the placement of down-gradient monitoring wells (discussed above) and, in some cases, may facilitate the drilling of additional wells.

Conclusion

These are some things that owners and operators can do to ensure that they collect adequate data to support the DEQ's decision to close their release after all the investigation and cleanup work is done. Owners and operators should collaborate with their environmental consultants and the PRS project manager early in their release and during each investigative or cleanup activity to ensure their efforts are working efficiently and effectively toward an ultimate and smooth closure review at the end.

Request closure in a separate letter

Once owners and operators are certain that the release meets all the criteria outlined in Technical Guidance Document 9 for closure, then they should request closure in a stand-alone letter sent to the PRS project manager. The letter should state that they have reviewed the checklist in Appendix-A of the Technical Guidance Document 9 and they have answered "yes" to all applicable items. If the owners and operators have any questions regarding whether they have met any of the items in Appendix-A, they should contact the PRS project manager for specific guidance at their particular site. ■

Station Owners Back Alternative-fuel Research

In response to pending federal legislation intended to promote the use of alternative fuels, groups representing the nation's gas station owners have sent a letter to the U.S. House of Representatives Science Committee promoting research programs that would ease the transition to E85 and low-sulfur diesel.

SOCIETY OF INDEPENDENT GASOLINE MARKETERS OF AMERICA

NATIONAL ASSOCIATION OF CONVENIENCE STORES
1600 Duke Street
Alexandria, VA 22314

SOCIETY OF INDEPENDENT GASOLINE MARKETERS OF AMERICA
11495 Sunset Hills Road
Reston, VA 22090

June 21, 2006

The Honorable Bar Gordon
Ranking Minority Member
Committee on Science
U.S. House of Representatives
2304 Rayburn House Office Building
Washington, D.C. 20515

Re: NACS and SIGMA support for H.R. 5658.

Dear Congressman Gordon:

The National Association of Convenience Stores (NACS) and the Society of Independent Gasoline Marketers of America (SIGMA) thank you for the leadership you have consistently shown in support of the nation's motor fuels marketers. NACS and SIGMA also support your efforts in H.R. 5658 to address some of the technical challenges that face the industry as it seeks to accommodate alternative fuels and ultra low sulfur diesel.

NACS is an international trade association comprised of more than 2,200 retail member companies operating more than 100,000 stores. The convenience store industry as a whole sold 143.5 billion gallons of motor fuel in 2005 and employs 1.5 million workers across the nation.

Station Owners Back Alternative-fuel Research - *continued from page 8*

The Honorable Bar Gordon – page 2

SIGMA is an association of more than 240 independent motor fuel marketers operating in all 50 states. Last year, SIGMA members sold more than 58 billion gallons of motor fuel, representing more than 30 percent of all motor fuels sold in the United States in 2005. SIGMA members supply more than 35,000 retail outlets across the nation and employ more than 350,000 workers nationwide.

Together, NACS and SIGMA members sell approximately 80 percent of the gasoline and diesel fuel purchased by consumers across the nation each year.

Specifically, NACS and SIGMA are encouraged by provisions in H.R. 5658 that would direct important research into two specific areas: (1) the incompatibility, without significant investment, of E85 and other alternative fuels with existing retail motor fuel dispenser and underground storage tank systems, such as those caused by the highly corrosive nature of high concentrations of ethanol in a motor fuel; and, (2) the absence of an accurate, affordable, and reliable test for diesel fuel sulfur levels that can be used by marketers to ensure retail compliance with the ultra low sulfur diesel fuel program. Successful results from these two research projects will facilitate, respectively, the spread of E85 marketing at retail outlets and the phase-in of ultra low sulfur diesel fuel across the country.

Again, NACS and SIGMA thank you for your leadership on these important marketer issues. Please let us know how we can assist you in moving this legislation forward in the future.

Sincerely yours,
John Eichberger
Vice President
National Association of Convenience Stores

Gregory Scott
Counsel
Society of Independent Gasoline Marketers of America

Installer, Remover, Inspector Courses Set

The Department of Environmental Quality is sponsoring underground storage tank installer, remover, and compliance inspector refresher courses October 4 and 5 in Helena. Current license holders are advised to check the expiration date of their licenses and ensure they have sufficient continuing education credits until the next department-sponsored "refresher" classes. The refresher classes are only held annually in the fall.

A total of 16 hours of continuing education credits are required every three years to renew an installer or compliance inspector license. At least eight of the 16 hours must be a department refresher course. Licensed removers need only eight hours of continuing education every three years, four of which must be from a department refresher course.

The compliance inspector and installer/remover refresher classes will be held at Room 156, Jorgenson's Inn, 1714 Eleventh Avenue, Helena. Jorgenson's is located adjacent to the Capital Hill Mall on the east side.

The remover refresher course will be held at Room 233 (third floor) at the department's Metcalf Building, 1520 East Sixth Avenue, Helena, MT. All day courses will have a one hour, no-host lunch break.

To register please contact Janie Petaja at (406) 444-4656 or E-mail to: jpetaja@mt.gov. ***Please submit the registration form 20 days prior to the course date***. Study guides for installers are available upon request at a cost of $148.

REFRESHER COURSE	DATE	TIME	LOCATION
Installer/Remover Refresher	Thursday October 5, 2006	8am – 5pm	Jorgenson's Inn – Room 156
Remover (ONLY) Refresher	Wednesday October 4, 2006	1pm – 5pm	Metcalf Bldg. – Room 233
Compliance Inspector Refresher	Wednesday October 4, 2006	8am – 5pm	Jorgenson's Inn – Room 156

Enforcement Report

Recent action by the Enforcement Division of the Montana Department of Environmental Quality included collection of a penalty payment of $1,500 from Alsaker Corp.'s Flying J, Inc., of Bozeman for failure to conduct proper leak-detection monitoring and failure to report a suspected release as required by the Underground Storage Tank Act.

Failure to conduct leak-detection monitoring also brought penalty payments of $1,350 from Mariners Haven Campground of Rexford, and $400 from the Potomac School District.

The DEQ Enforcement Division also received a $1,100 penalty payment from Billings-based Don's Car Washes of Montana for failure to conduct monthly leak-detection monitoring and provide corrosion protection as required by the UST Act.

CHS Milk River Coop in Hill County paid a $120 penalty because the organization was late in submitting monthly leak-detection records under a compliance schedule. ■

Petro Board Promulgated Rules to Implement Legislative Changes

The Montana Petroleum Tank Release Compensation Board conducted a public hearing June 7 on proposed amendments to the board's existing rules governing operation and management of petroleum storage tanks and review of claims.

The 2005 Montana Legislature modified and renumbered certain board rules and added a new section including new provisions for suspension of claims in cases where an eligible owner or operator falls out of compliance for reimbursement. Circumstances under which an owner or operator is deemed to be out of compliance and, therefore, his claims must be suspended are delineated in the newly enacted Sections 75-11-309(2) and (3)(b)(ii) of the Montana Code Annotated (MCA).

The new provisions of the law also provide that if an out-of-compliance owner or operator with suspended claims regains compliance status, then the suspected and future claims may be reimbursed under board established criteria. ■

Have you looked at TankHelper? Tell us what you think.

The logic and programming behind Montana's TankHelper training is complex. We have found and repaired a handful of "bugs" in the system. We would be surprised if there aren't a few more out there awaiting our discovery. We would like to ask you users how it is working for you. For those of you who have investigated TankHelper, what are you finding?

On a scale of 1-7, one being lousy, four being so-so, and seven being great:

How user-friendly is TankHelper? _____

I had problems at the following points:_____

_____

_____

_____

add more if necessary

How accurate is DEQ's database? _____

How helpful were the training points? _____

How helpful was the comparison table? _____

How helpful was the Compliance Management Plan? _____

What would make TankHelper better?_____

_____

_____

_____

_____

Please send to: John Brown, DEQ/USTS
P. O. Box 200901
Helena, MT 59620

or email comments to jbrown@mt.gov